



301342

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**MEMORANDUM**

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TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/lg/94 DATE: May 31, 2007

C.C.: RRG/Clayton Site Technical Committee  
P. Harvey  
R. Shepherd  
B. Schloessler

RE: Status Report # 19 for the Resource Recovery Group/Clayton Chemical Company Site

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This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this nineteenth Monthly Status Report is April 30, 2007, through May 25, 2007.

**EFFECTIVE DATE**

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 18 was submitted to U.S. EPA on May 1, 2007.

Please note that page 2 of Status Report # 18 incorrectly reported the period discussed in the weekly summary report included as Appendix A of the report. The first bullet point mentions activities performed during the week of March 26, 2006. The correct timeframe should have been the week of March 26, 2007.

**1.0 COMPLETED ACTIVITIES****1.1 PRE-MOBILIZATION, MOBILIZATION AND  
REMOVAL ACTIVITIES COMPLETED TO DATE**

Activities completed during the reporting period were primarily related to the attempted scheduling of the proposed activities presented to U.S. EPA on April 19, 2007 in response to the subsurface oil discovered at the northeast quadrant of the Site on March 16, 2007. Field activities were performed during visits to the Site during two (2) of the four (4) weeks discussed in this report.

CRA conducted Site inspections during the weeks of May 7 and 21, 2007 with the primary goal of monitoring Site conditions related to the oil situation. START Bob Hill was present during both visits and

no significant/notable/appreciable changes in Site/area conditions were noted during these visits. No field activities were completed during the weeks of April 30 and May 14, 2007.

Additional details of the completed tasks are provided for review in this report.

A weekly summary of activities appears below:

- During the week of April 30, 2007 (April 30 – May 4, 2007), the primary activities that were completed centered on CRA's attempts to arrange for subcontractor availability for the U.S. EPA suggested/proposed mobilization date of May 7, 2007, as well as the submission of the monthly Status Report.

On April 26, 2007, OSC Turner requested that the proposed activities not take place without him being present. In his electronic mail (e-mail) response to The Respondents, OSC Turner proposed a mobilization date that CRA and The Respondents attempted to comply with. However, a feasible/practical timetable could not be implemented by all the involved subcontractors. This scheduling issue was primarily due to difficulties in confirming a timely disposal option for the materials expected to be recovered during the removal operation. Subsequently, on May 4, 2007, The Respondents replied to a follow up e-mail from OSC Turner and informed him that the alternate mobilization date of June 4, 2007, presented in his May 4, 2007 e-mail would be a more attainable deadline. No Site visits were initiated during the week of April 30, 2007;

- The primary activities completed during the week of May 7, 2007 involved the continued attempts to schedule a comprehensive Site deployment for the week of June 4, 2007 to address the situation with the subsurface oil and the planned investigation of the Waste Drum Storage Building (Drum Building) loading dock and the completion of a Site inspection. CRA continued discussions with various transportation and disposal options to achieve a reasonable timeframe for completing the removal, transport and disposal of the oil/water mixture anticipated to be vacuumed out during the planned removal action. A Site visit was scheduled for May 11, 2007 by CRA and START Bob Hill was made aware of the planned activity. Subsequently, START Hill and CRA Garth Daley completed a reconnaissance of the entire Site on May 11, 2007. During the reconnaissance, particular attention was given to the northeast portion of the Site. However, no appreciable change in area or Site conditions was noted during the inspection;
- For the week of May 14, 2007, the primary focus of Site-related activities was the continued attempts to schedule a comprehensive Site deployment for the week of June 4, 2007 to address the situation with the subsurface oil. No Site visit was scheduled for the week; and
- The continued response/investigation activity scheduling attempts and scheduling of a Site visit were once again the primary activity for the week of May 21, 2007. A Site visit was performed on May 24, 2007 during which an inspection of the northeast corner of the site was completed with START Bob Hill. No notable changes in area conditions were noted.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for April 30 – May 4, 2007; Appendix B – Weekly Summary of Site Activities for May 7 – 11, 2007; Appendix C – Weekly Summary of Site Activities for May 14 – 18, 2007; and Appendix D – Weekly Summary of Site Activities for May 21 – 25, 2007.

## **1.2 SAMPLING AND ANALYSIS**

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by the Respondents. This request was approved by OSC Turner on April 20, 2006. However, TEK-Lab, Inc. of Collinsville, Illinois has been used for the performance of waste characterization sample analysis to assist with/complete waste disposal activities.

Sample collection activities were not undertaken at the Site during the reporting period.

No analytical results were received during the reporting period.

## **1.3 REMOVAL ACTION WORK**

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through D of this report.

## **2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS**

No significant technical problems were encountered during the reporting period. Similarly, no technical problems or issues are anticipated for the upcoming period.

## **3.0 ANALYTICAL DATA GENERATED/RECEIVED**

As stated in Section 1.2, no samples were collected at the RRG/Clayton Site during the reporting period. Also as stated previously, no analytical reports were received between April 30 and May 25, 2007.

## **4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD**

### **4.1 SITE PLANS**

During the upcoming reporting period (May 28, 2007, through June 22, 2007), the following activities are anticipated:

- Activities discussed in the submitted Oil Response Plan will be initiated;
- Activities related to the U.S. EPA proposed investigation of the Waste Drum Storage (Drum) Building loading dock structure will be initiated;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the activities discussed above and weather conditions; and

- Site restoration activities, weather permitting, will be initiated.

#### **4.2 SAMPLING AND ANALYSIS**

No sampling is anticipated during the upcoming reporting period.

#### **4.3 REMOVAL ACTION WORK**

Among the activities expected to be performed and/or completed during the upcoming report period are the removal and investigation of the subsurface oil at the northeast portion of the Site, the investigation of the interior of the Drum Building loading dock, and limited Site restoration activities. An anticipated schedule for these activities appears below.

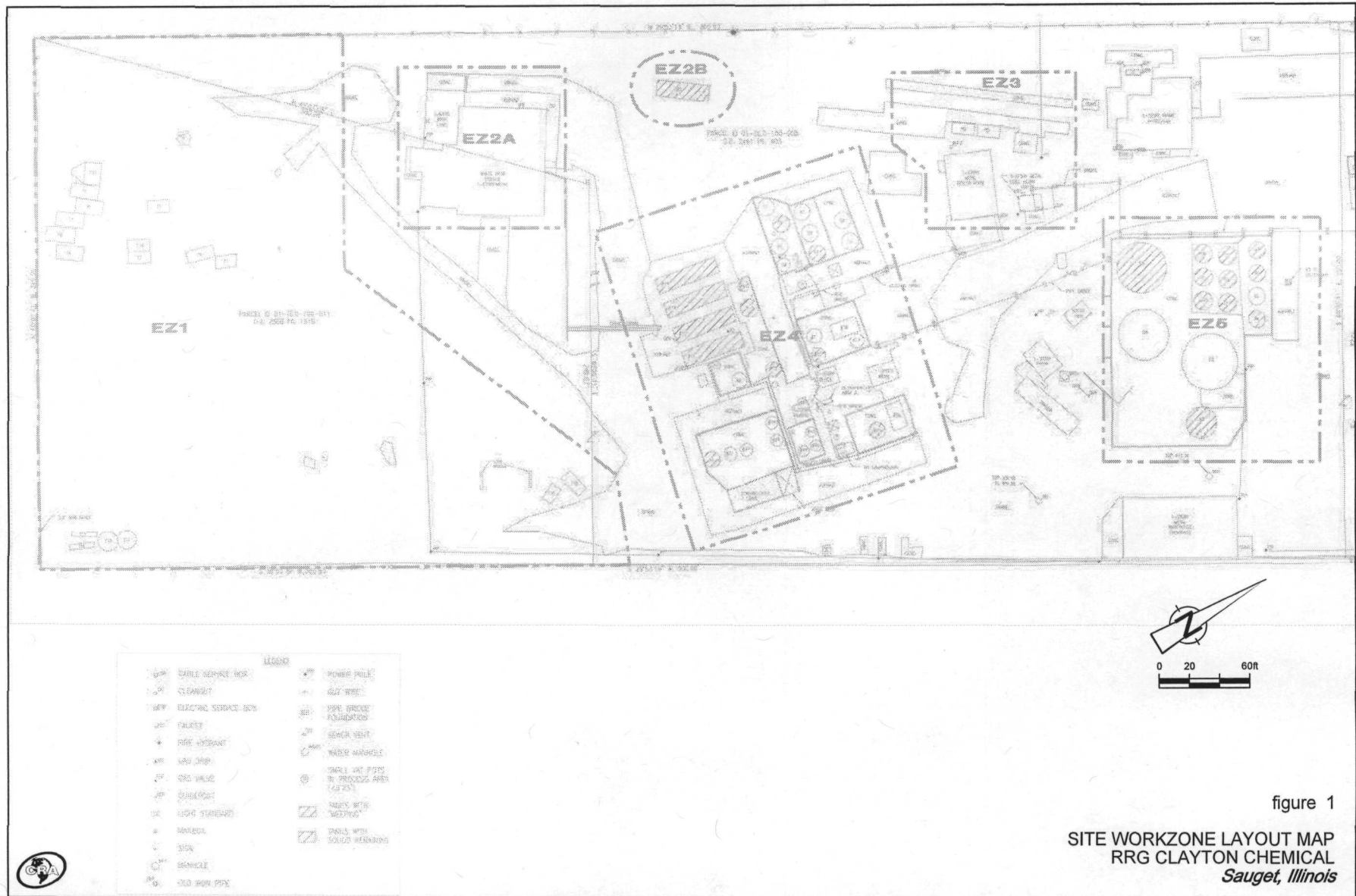
#### **5.0 ANTICIPATED SCHEDULE**

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Install Stormwater Control Measures	As needed/ongoing	May 29, 2007
Continue Technical Design and Construction Scheduling of Proposed Landfill Cap	Ongoing/30 days	May 29, 2007
Initiate the Proposed Oil Response Activities	Ongoing/30 days	June 4, 2007
Initiate the Proposed Drum Building Loading Dock Investigation Activities	Ongoing/30 days	June 7, 2007
Initiate Site Restoration Activities	Ongoing/30 days	May 29, 2007
Submit Status Report # 20	1 day	June 29, 2007

Attachments

FIGURE 1

SITE MAP



## APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR APRIL 30 – MAY 4, 2007



**CONESTOGA-ROVERS  
& ASSOCIATES**

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## MEMORANDUM

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TO: RRG/Clayton Chemical Site Technical Committee      REF. NO.: 042192-03

FROM: Garth Daley/lg/90      DATE: May 31, 2007

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: Weekly Summary Of Site Activities For April 30 - May 4, 2007

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Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-fourth week (the period April 30 through May 4, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 30, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007



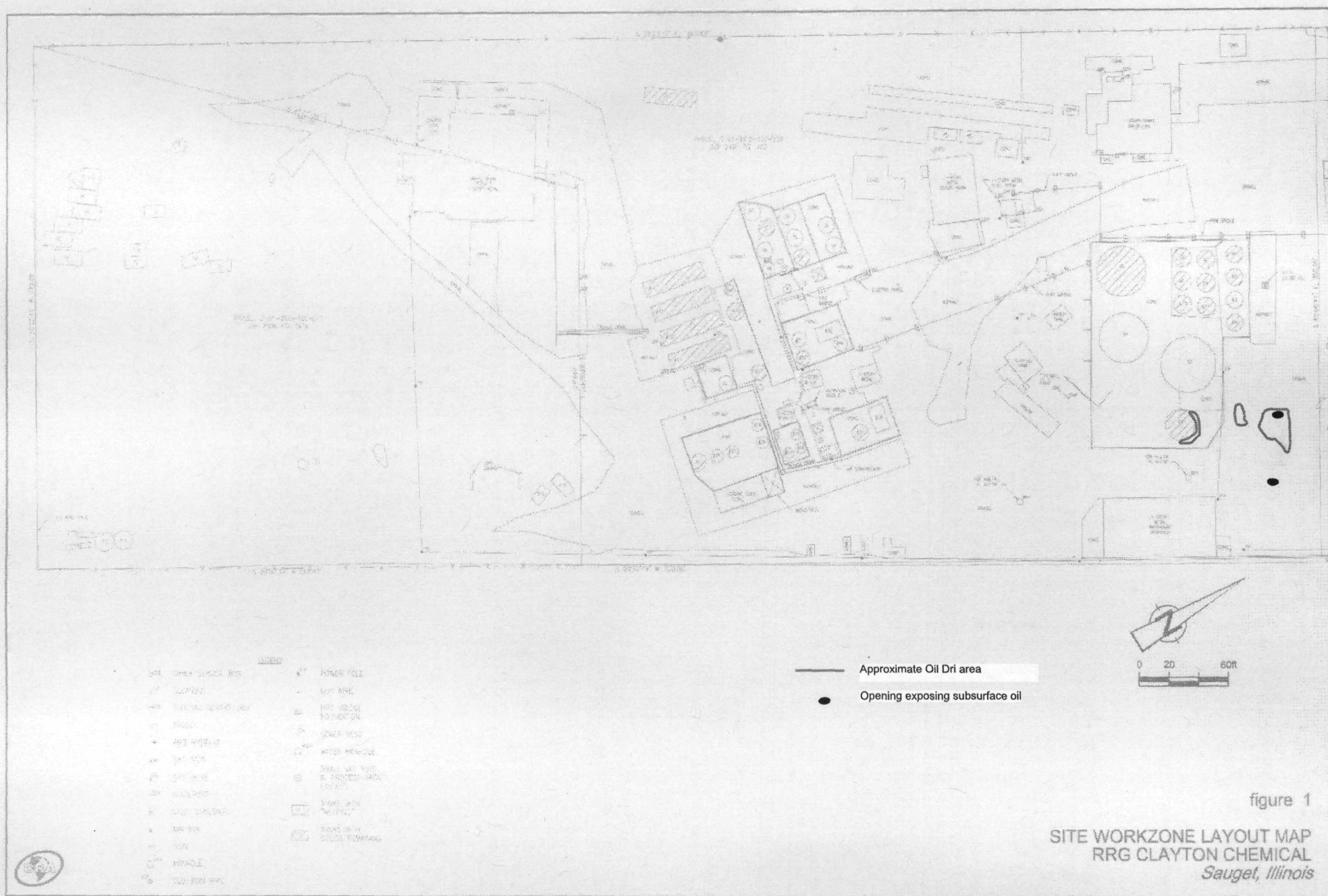
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 30, 2007	Miscellaneous	The Respondents continued discussions with possible subcontractors to schedule the performance/completion of the proposed oil removal/investigation activities during the week of May 7 - 11, 2007
May 1, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted Status Report # 18 to U.S. EPA/OSC Kevin Turner
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to schedule the performance/completion of the proposed oil removal/investigation activities during the week of May 7 - 11, 2007
May 2, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 2, 2007	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to schedule the performance/completion of the proposed oil removal/investigation activities during the week of May 7 - 11, 2007
May 3, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to schedule the performance/completion of the proposed oil removal/investigation activities during the week of May 7 - 11, 2007
May 4, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. OSC Turner contacted The Respondents to determine if the U.S. EPA proposed mobilization date/deadline of May 8, 2007 would be met. As an alternate, OSC Turner proposed completing the planned activities during the week of June 4 <sup>th</sup> . The Respondents informed OSC Turner that mobilization for the week of May 7 <sup>th</sup> was not feasible due to the unavailability of a qualified supervisor from Brandenburg
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 4, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR MAY 7 – 11, 2007



**CONESTOGA-ROVERS  
& ASSOCIATES**

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## MEMORANDUM

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TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/91 DATE: May 30, 2007

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: Weekly Summary Of Site Activities For May 7 -11, 2007

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Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-fifth week (the period May 7 through 11, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 7, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 7, 2007	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 8, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 9, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 9, 2007	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 10, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Hill was contacted via telephone and informed of the planned May 11, 2007 Site visit
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 11, 2007	Mobilization Activities	CRA mobilized to the Site to perform a Site inspection
	Project Coordination	START Bob Hill was on Site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007



<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 11, 2007	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities. No notable changes in Site conditions, particularly at the suspected oil impact area, were noted

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



## APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR MAY 14 - 18, 2007



**CONESTOGA-ROVERS  
& ASSOCIATES**

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## MEMORANDUM

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TO: RRG/Clayton Chemical Site Technical Committee      REF. NO.: 042192-03

FROM: Garth Daley/lg/92      DATE: May 30, 2007

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: Weekly Summary Of Site Activities For May 14 -18, 2007

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Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-sixth week (the period May 14 through 18, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 14, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 14, 2007	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 15, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 16, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 16, 2007	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 17, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 18, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted a Quality Management Plan (QMP) to U.S. EPA/OSC Kevin Turner for review as a possible waste hauler to be used for the scheduled oil removal activities. OSC Turner was also informed that the sequence of activities scheduled for the week of June 4 <sup>th</sup> may be switched based on the availability of a dedicated PCB tanker truck, i.e., the dock investigation activities may be completed from June 5 - 6 instead of June 7 - 8
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 18, 2007	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities. Also, The Respondents requested an update from OSC Turner regarding the review status of the proposed conceptual landfill cap design

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment





## APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR MAY 21 – 25, 2007



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
Telephone: (773) 380-9933 Fax: (773) 380-6421  
www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/93 DATE: May 30, 2007

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: Weekly Summary Of Site Activities For May 21 -25, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-seventh week (the period May 21 through 25, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 21, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. OSC Kevin Turner responded to the May 18 <sup>th</sup> e-mail from The Respondents regarding the intended mobilization date of June 4 <sup>th</sup> . OSC Turner also stated/confirmed/consented that the sequencing of events (oil removal and dock investigation) can be changed as needed
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 21, 2007	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 22, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 23, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was informed of a planned Site visit on May 24, 2007
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 23, 2007	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 24, 2007	Mobilization Activities	CRA personnel mobilized to the Site to complete a Site inspection
	Project Coordination	START Bob Hill was on Site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities. No notable changes in Site conditions, particularly at the suspected oil impact area, were noted
May 25, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
May 25, 2007	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

